

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 654 & 1197

SUPPLEMENTAL DECLARATION

I, Nicolai Binkert, declare under penalty of perjury:

1. I am a partner of Schurti Partners Attorney at Law Ltd, located at Zollstrasse 2, 9490 Vaduz, Principality of Liechtenstein (the "Firm").
2. On February 8, 2023, in compliance with the *Order Authorizing Procedures to Retain, Compensate and Reimburse Professionals Utilized in the Ordinary Course of Business* [D.I. 432], I submitted a declaration in support of the Firm's retention as an Ordinary Course Professional [D.I. 654] (the "Original Declaration"). On March 30, 2023, in response to certain concerns raised by the Office of the United States Trustee (the "U.S. Trustee") regarding the Firm's inability to disclose the identity of its connections to parties listed on the PII List under applicable foreign law and its request for additional information related thereto, I submitted a supplemental declaration identifying such law and providing certified English

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

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translations thereof (the “Supplemental Declaration” and together with the Original Declaration as the “Declarations”).²

3. As set forth in paragraph 6 of the Original Declaration and as further explained in paragraph 3 of the Supplemental Declaration, the Firm is prohibited by applicable foreign law from disclosing the identity of its clients in the absence of express client consent. Since the filing of the Supplemental Declaration, the Firm worked diligently to obtain the consent of each of its current clients identified on the PII List attached to the Original Declaration (the “Schurti Connections”) to disclose their identity solely to the Debtors, the Court, the U.S. Trustee, and the Committee; provided, however, that any such disclosures must be made on a confidential basis under seal and not disclosed in any public manner. Attached hereto as Exhibit A is a list of the Schurti Connections.

4. To the best of my knowledge, formed after due inquiry, neither I, the Firm, nor any attorney or employee thereof (i) has any connection with the Debtors or (ii) currently represents (or previously represented) any of their creditors, other parties-in-interest, the U.S. Trustee or any person employed by the U.S. Trustee with respect to the Debtors or the matters upon which the Firm is to be engaged. For the avoidance of doubt, the Firm does not represent any of the Schurti Connections in connection with these Chapter 11 Cases. Additionally, the Firm, its attorneys and employees do not, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors, hold or represent any interest adverse to the Debtors, their estates or any class of creditors or equity interest holders with respect to the matters upon which the Firm is to be employed, except as disclosed herein.

² Capitalized terms utilized but not otherwise defined herein shall have the same meanings as ascribed to them in the Original Declaration or the Supplemental Declaration as applicable.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 28, 2024



Nicolai Binkert